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FILED  
APR 08 2015  
BUREAU OF REAL ESTATE  
By L. J. West

BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

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In the Matter of the Application of	)	
	)	H- 6179 SAC
RHIANNA EILEEN WILLIAMS,	)	
	)	<u>FIRST AMENDED</u>
	)	<u>STATEMENT OF ISSUES</u>
Respondent.	)	

The Complainant, HEATHER NISHIMURA, in her official capacity as a Deputy Real Estate Commissioner of the State of California, brings this First Amended Statement of Issues against RHIANNA EILEEN WILLIAMS, ("Respondent") and is informed and alleges as follows:

1

On or about March 11, 2014, Respondent made application to the Bureau of Real Estate of the State of California ("the Bureau") for a real estate salesperson license.

2

On or about November 1, 2006, in the Superior Court of the State of California, County of San Joaquin, Case No. SM253819A, Respondent was convicted, upon a plea of guilty, of violating Section 484(a) of the Penal Code (petty theft), a misdemeanor, and a crime which

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1 bears a substantial relationship under Section 2910, Title 10 of the California Code of  
2 Regulations to the qualifications, functions, or duties of a real estate licensee.

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5 On or about September 16, 2013, in the Superior Court of the State of California,  
6 County of San Joaquin, Case No. SF124644A, Respondent was convicted, upon a plea of no  
7 contest, of violating Section 148 of the Penal Code (resist/obstruct peace officer), a  
8 misdemeanor, and a crime which bears a substantial relationship under Section 2910 of the  
9 Regulations to the qualifications, functions, or duties of a real estate licensee.

10 4

11 The facts alleged in paragraphs 2 and 3, above, constitute cause for denial of  
12 Respondent's application for a real estate license under Sections 480(a)(1) (denial of license by  
13 board-conviction of crime) and 10177(b) (conviction of crime substantially related to  
14 qualifications, functions or duties of real estate licensee) of the Business and Professions Code  
15 ("the Code").

16 5

17 The facts alleged in paragraph 2, above, constitute cause for denial of  
18 Respondent's application for a real estate license under Sections 480(a)(2) (denial of license by  
19 board-fraud or dishonesty) and 10177(j) (fraud or dishonesty) the Code.

20 WHEREFORE, Complainant prays that the above-entitled matter be set for  
21 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to  
22 authorize the issuance of, and deny the issuance of a real estate salesperson license to  
23 Respondent, and for such other and further relief as may be proper under other provisions of law.

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25 HEATHER NISHIMURA  
26 Deputy Real Estate Commissioner

27 Dated at Sacramento, California

this 8<sup>th</sup> day of April, 2015.